## **REMARKS**

Applicants respectfully request reconsideration of the present case in view of the above amendments and the following remarks.

Claims 13, 25, 39, and 51 have been amended. Claims 13, 14, 16-26 and 28-66 are currently pending. No new matter has been inserted. Support for the amendment of claims 13, 25, 39, and 51 can be found in the specification at least at page 7, lines 6-10, and in Figure 2.

## 35 U.S.C. § 102(e)

Claims 13-14, 16-24, 37, 39-50, 63 and 65 were rejected under 35 U.S.C. § 102(e) as anticipated by Barron et al., US 6,030,575. Applicants respectfully traverse this rejection.

Barron discloses that the "binder has a certain 'flowability' to optimally adhere the fibers without unnecessary additional migration along the fiber surface." See col. 7, lines 25-27 (emphasis added). Barron further discloses that the binder is "generally still extremely viscous when it contacts the fibers." See col. 8, line 28. Therefore, applicants assert that Barron does not disclose or suggest that "the inorganic binder <u>surrounds</u> the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13 and 39 (emphasis added). Accordingly, Barron does not anticipate the inventions of claims 13 or 39. As claims, 14, 16-24, 37, and 63 are dependent on claim 13 they are also not anticipated. And as claims 40-50, and 65 are dependent on claim 39 they are also not anticipated. Applicants respectfully request that this rejection be withdrawn.

## 35 U.S.C. § 103(a)

Claims 22, 25-26, 28-36, 38, 47, 51-62, 64 and 66 were rejected under 35 U.S.C. § 103(a) over Barron et al. and further in view of EP 0 807 703 to Sakai et al. Applicants respectfully traverse this rejection.

As described above, Barron fails to disclose or suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13, 25, 39, and 51. In fact, Barron teaches away from the present invention by stating that the binder "optimally adhere[s] the fibers

without unnecessary additional migration along the fiber surface." See col. 7, lines 25-27. Applicants assert that Sakai fails to cure the deficiencies of Barron.

Sakai discloses a nonwoven fabric cloth substrate for printed wiring boards. However, Sakai does not disclose or suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13, 25, 39, and 51. Therefore the combination of Barron and Sakai fails to teach or suggest the invention of claims 13, 25, 39, and 51. As claim 22 is dependent on claim 13, as claims 26, 28-36, 38, and 64 are dependent on claim 25, as claim 47 is dependent on claim 39, and as claims 52-62 and 66 are dependent on claim 51, these claims are also not anticipated or suggested.

Claims 13-14, 16-24, 37, 39-50, 63 and 65 were rejected under 35 U.S.C. § 103(a) over Barron et al. in view of Applicant's disclosure. Applicants respectfully traverse this rejection.

As described above, Barron fails to disclose or suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13 and 39. Applicants assert that statements regarding what is known in the art contained in Applicants' disclosure do not cure the deficiencies of Barron.

The Applicants' disclosure does not suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections" is known in the art. As this limitation is required by claims 13 and 39, the combination of Barron and Applicants' statements regarding what is known in the art fail to teach or suggest the invention of claims 13 and 39. As claims 14, 16-24, 37, and 63 are dependent on claim 13, and as claims 40-50 and 65 are dependent on claim 39, these claims are also not anticipated or suggested.

Claims 22, 25-26, 28-36, 38, 47, 51-62, 64 and 66 were rejected under 35 U.S.C. § 103(a) over Barron et al. in view of Applicant's disclosure as applied to claims 13-14, 16-24, 37, 39-50, 63 and 65 above, and further in view of EP 0 807 703 to Sakai. Applicants respectfully traverse this rejection.

As described above, Barron fails to disclose or suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13, 25, 39, and 51. Applicants assert that statements regarding what is known in the art contained in Applicants' disclosure and Sakai do not cure the deficiencies of Barron.

Specifically, Applicants' disclosure does not suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13, 25, 39, and 51, is known in the art. Further, Sakai does not disclose or suggest that "the inorganic binder surrounds the thermal-resistant synthetic fibers at the intersections of the fibers and at portions of the fibers other than at intersections", as required by claims 13, 25, 39, and 51. Therefore, the combination of Barron, Applicant's disclosure, and Sakai fail to teach or suggest the inventions of claims 13, 25, 39, and 51. As claim 22 is dependent on claim 13, as claims 26, 28-36, 38, and 64 are dependent on claim 25, as claim 47 is dependent on claim 39, and as claims 52-62 and 66 are dependent on claim 51, these claims are also not anticipated or suggested.

## Summary

In view of the above amendments and remarks, Applicants respectfully request a Notice of Allowance. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned at the below-listed telephone number.

Respectfully submitted,

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